

1 Michael G. Spector-Bar No. 145035
2 Vicki L. Schennum (Of Counsel)- Bar No. 159628
2 **LAW OFFICES OF MICHAEL G. SPECTOR**
3 2122 North Broadway
3 Santa Ana, California 92706
4 Tel. (714) 835-3130
4 Fax. (714) 558-7435
5 mgspector@aol.com

6 Attorneys for the Debtor
7 DAVID R. STONE

8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA, RIVERSIDE DIVISION**

10 In re) Case No. 6:25-bk-12353 SY
11) Chapter 7
12)
13 DAVID ROBERT STONE,) **STIPULATION TO CONTINUE**
14) **CHAPTER 7 TRUSTEE'S MOTION FOR**
14) **ORDER AUTHORIZING:**
15) **(1) REVOCATION OF THE DEBTOR'S**
15) **LIVING TRUST; AND**
16) **(2) USE OF PROPERTY OF THE**
16) **ESTATE**
17)
18) Date: June 26, 2025
18) Time: 9:30 a.m.
18) Courtroom: 302

19

20 **TO THE HONORABLE SCOTT H. YUN, UNITED STATES BANKRUPTCY JUDGE:**

21 Larry D. Simons, Chapter 7 Trustee and David R. Stone, the Chapter 7 Debtor herein, by and
22 through their counsel of record, stipulate as follows:

23

24 **RECITALS**

25 **WHEREAS** On April 14, 2025, the Debtor filed within Chapter 7 proceeding.

26 **WHEREAS** Larry D. Simons is the appointed Chapter 7 Proceeding.

27 **WHEREAS** The Chapter 7 Trustee has conducted the initial meeting of creditors, which has
28 presently been continued to June 17, 2025 at 1:00 p.m.

1 **WHEREAS** on June 5, 2025, the Chapter 7 Trustee filed a Motion for Order Authorizing: (1)
2 Revocation of Debtor's Revocable Living Trusts; and (2) Use Property of the Estate, which is set for
3 June 26, 2025 (hereinafter referred to as the "Revoke Trust Motion").

4 **WHEREAS** the Debtor's opposition to the Revoke Trust Motion is due at a time that his counsel
5 had planned to be unavailable due to his daughter's graduation outside of California.

6 **WHEREAS** the next available self-calendaring date on the Court's calendar to hear this type of
7 matter is July 10, 2025 at 9:30 a.m.

8 **WHEREFORE**, to accommodate counsel's schedule, the parties agree to continue the Revocation
9 Trust Motion to July 10, 2025 at 9:30 a.m., with the Opposition due fourteen (14) days prior thereto.

STIPULATION

12 **IT IS HEREBY STIPULATED** that the Revoke Trust Motion should be continued to July 10,
13 2025 at 9:30 a.m., with the Opposition due fourteen (14) days prior thereto.

15 || Dated: June 12, 2025

MARSHACK HAYS WOOD, LLP

By:

D. Edward Hays
Laila Rais
Attorneys for Chapter 7 Trustee
LARRY D. SIMONS

20 || Dated: June 12, 2025

LAW OFFICES OF MICHAEL G. SPECTOR

By: /s/ Vicki L Schennum

Michael G. Spector
Vicki L. Schennum (Of Counsel)
Attorneys for the Debtor
DAVID ROBERT STONE

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 2122 N. Broadway, Santa Ana, CA 92706

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION TO CONTINUE CHAPTER 7 TRUSTEE'S MOTION FOR ORDER AUTHORIZING: (1) REVOCATION OF THE DEBTOR'S LIVING TRUST; AND (2) USE OF PROPERTY OF THE ESTATE** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **June 12, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Anthony Bisconti	tbisconti@bklwlaw.com, 1193516420@filings.docketbird.com, docket@bklwlaw.com
Charles L Doerksen	cld@doerksentaylor.com
Anthony Dutra	adutra@hansonbridgett.com, ssingh@hansonbridgett.com
Christopher Hart	chart@nutihart.com, admin@nutihart.com
Sarah Rose Hasselberger	shasselberger@marshackhays.com, shasselberger@ecf.courtdrive.com;cbastida@marshackhays.com; alinares@ecf.courtdrive.com
D Edward Hays	ehays@marshackhays.com, ehays@ecf.courtdrive.com;alinares@ecf.courtdrive.com; cmendoza@marshackhays.com;cmendoza@ecf.courtdrive.com
Chris D. Kuhner	c.kuhner@kornfieldlaw.com
Paul J Laurin	plaurin@btlaw.com, slmoore@btlaw.com;jboustani@btlaw.com;jose.barajas@btlaw.com
Stacey A Miller	smiller@tharpe-howell.com
Laila Rais	lmasud@marshackhays.com, lmasud@ecf.courtdrive.com;lbuchanan@marshackhays.com; alinares@ecf.courtdrive.com
Larry D Simons (TR)	larry@janus.law, c119@ecfcbis.com; nancy@lsimonslaw.com; simonsecf@gmail.com;keila@janus.law
William A Smelko	William.Smelko@procopio.com, anant.pandadiya@procopio.com, calendaringbankruptcy@procopio.com
Michael G Spector	mgspector@aol.com, mgslawoffice@aol.com
Edward A Treder	cdcaecf@bdfgroup.com
United States Trustee (RS)	ustpregion16.rs.ecf@usdoj.gov
Reilly D Wilkinson	rwilkinson@scheerlawgroup.com, rwilkinson@ecf.courtdrive.com

2. SERVED BY UNITED STATES MAIL:

On **June 12, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FAXSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on , I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 12, 2025
Date

Vicki L. Schennum
Printed Name

/s/ Vicki L. Schennum
Signature